

MEMO ENDORSED

JONATHAN BARAM
PO BOX 219
LONG BEACH, NEW YORK
917-459-2209

For the reasons stated in the Court's previous orders, Doc. 126, the requests are denied.

JANE DOE VS. JONATHAN BARAM
CV 1:20 09522

It is SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 3/26/2025

New York, New York

March 25, 2025

Motion To Redact Names

Notarized Affidavit

Dear the honorable Edgardo Ramos,

Jonathan Baram, being of lawful age and sound mind, of testifies as follows:

I am a resident of Dade County, Florida.

I am Prosey.

I am requesting to redact the names Jonathan T. Baram and Warren and Baram Management LLC from the lawsuit Jane Doe vs. Jonathan Baram.

These unproven, false and criminal accusations have destroyed my whole world. Every day I am fearful of being physically harmed when I go outside.

My family and I have received multiple death and property threats because of the false, horrific and criminal accusations against me and my business from Dicello/Levitt/Amanat.

Dicello/Levitt/are a self proclaimed "personal injury" law firm.

Dicello/Levitt/Amanat have spent no time in any courtroom at trial in America regarding sex trafficking of minors or adults. As a result of having no trial time they do not have any experience regarding sex trafficking minors or adults. This is partially the reason why they dismissed the lawsuit against me. They wasted everyone's time. They were simply put "out of their lane."

The law firm Dicello/Levitt was founded only 3 years prior to when they served me in 2020 with the false law suit complaint. It was initially very curious to me why an upstart personal injury law firm with offices in a slew of oddball places would be involved in a lawsuit as complex as litigation of sex trafficking a minor.

Subsequently, I realized that no experienced law firm "worth their salt" would represent Jane Doe in Jane Doe Vs. Jonathan Baram. This is because it was all a pathological lie with no "hard evidence."

In the graphic threat images that were sent to my cell phone, there were dismembered bloody, body parts with texts saying:

"watching your family decide now and call me you have 10 minutes to communicate with me"
 "I will be forced to
 proceed against you and your family you pay with money or blood
 I have people at your work your house and watching your family"

(Exhibit C)

Warning Graphic Images

I have not been able to make a reasonable income due to the fact that if you do an on-line search on my name and company name, I am portrayed as a child predator monster in the detailed civil lawsuit complaint. When potential employees do a background on me they're able to see that I am an accused child predator in the detailed, false civil complaint. This is affecting me and my family beyond words.

My gross income for the last 30 days is \$646.02. I can provide income for up to one year upon the court's request.

My bank account balance is ^{137.39}~~\$70.21~~ of my only bank account.

Exhibit B

(bank balance and income paystubs weekly)

My low income and low bank account is a direct result of the false evil press release and false law suit complaint that Dicello/Levitt/Amanat deceptively, distributed and promoted to the world calling me a self proclaimed "illegal pimp." They removed the press release from their website after many months of unethical usage but it was too late because the vicious damage was done to me and my family. They removed the press release from their web site because they knew it was wrong and they were guilty of defamation.

I dis proved their self- proclaiming "pimp" accusation against me by explaining to the court that this is "hip-hop vernacular" and I have a large presence in the hip-hop community because of music videos and booking talent. In the hip-hop culture the word

"Pimp" means:

-positive -individual -making -progress

They were the original creators of this false evil message about me. I have absolutely no criminal record and I've never been investigated for a crime in my entire life.

The
 horrific criminal behavior I am accused of is habitual behavior that is not part of my history. I've never been accused of sex trafficking any human being, let alone a minor in my entire life.

Not one single human being has come forward to corroborate these evil accusations against me since the lawsuit commenced over five and a half years ago.

Where are the other victims from this worldwide sex trafficking, mafia organization, my adversary's claim?

It is unreasonable and preposterous that there are no other alleged victims of my alleged worldwide mafia, sex trafficking ring presented deceptively, and falsely by Dicello/Levitt/Amanat. Especially because my accusations, pictures and name appeared all over the media "piggybacking" on celebrity fashion mogul Peter Nygard's crimes and notoriety.

As a result, the false and reckless accusations ended up in many major newspapers across the world and online.

The news articles displayed privately owned pictures of me. This created a very dangerous situation displaying my image to the world regarding the death threats next to the newspaper's text of being accused of being a sex trafficker in the article! I never gave consent for the usage of this photograph that is owned by me and the photographer.

Dicello/Levitt/Amanat's goal was to falsely associate me with Nygard, so the story would be appealing to the press. This was key to their failed extortion conspiracy plot against me. I am not a recognizable name and the media would not have published this story about the lawsuit Doe vs Baram, if I was alone as a defendant.

My adversaries did not present one shred of communication evidence between Nygard and I. If I ran an alleged major international sex trafficking organization as they claim, it would require massive amounts of communication between me and Nygard.

They did not present to the court any emails, texts, cell phone location pins or any type of communication between me and Nygard.

My advisories never presented to the court any bank or financial records.

International sex trafficking is more profitable than drug dealing so there would be loads of bank and financial records. A major international sex trafficking organization also requires a major financial and maintenance investment. No bank records or flight records were presented to the court by my adversaries.

The crux to any lawsuit regarding evidence is communication and bank records. They are "hard evidence" that was not presented by my adversaries to the court.

The law suit was all a lie, and not even based on a true story like most civil complaints.

Dicello/Levitt/Amanat could not even find one photograph of Nygard and me together in this social media world. Everyone has a cell phone camera in their pocket so this is unreasonable. This is because I have no association with Nygard whatsoever. If Nygard saw me on the street, he would walk right past me and not even know who I am. He has no clue what I even look like.

My prior industry, reputation to the lawsuit was an individual who treats his Latina/African American model/actor clients as family and nurtured them in an industry of sharks!

"But Baram is a manager, not an agent. While agents are well-known for only being out for their 10% of their clients' income, he prefers to take on more of a mentor role. He nurtures his models, cares for them

"like [his] own sisters," and makes them ridiculous amounts of money by getting them jobs in everything from music videos to feature films to the magazine you hold in your hands. Not bad work if you can if you can get it"

Jonathan Baram

Star-Media-August 2005

Exhibit A

(Magazine Interview Baram)

The false criminal accusations have created an enormous amount of overwhelming depression and stress that I've never felt before this lawsuit. I'm not able to sleep at night for the last 5 and a half years and before this complaint I was able to sleep very soundly. I'm not able to find a girlfriend or make meaningful friendships because of these accusations that appear in extreme detail online in the complaint Doe vs Baram. I never had a chance to tell my side of the story with my irrefutable evidence. I was denied my due process in America. Even being Prosey I would win this lawsuit because I never did anything that I was accused of by my adversaries.

Because I could not afford an attorney, Warren & Baram LLC was imposed into a 1 million dollar default judgment against an empty shell of an LLC corporation that exists in name alone with no bank account, no office property and no telephone number. This judgment can never ever be paid because I am "judgment proof" as a result of the false lawsuit. The LLC is a completely separate entity than me as an individual.

I requested to the court multiple times to go to deposition and trial. My adversaries plan from the beginning was deceptively, never to go to deposition and trial because they have no hard evidence against me.

They would not be able to produce Jane Doe at a deposition or court room because she's not a real human being.

The affidavit document they submitted to the court was not signed by Jane Doe because she is not a real human-being.

She is a figment of my adversaries' evil imagination.

The affidavit was fraudulently signed by the

attorneys Dicello/Levitt/Amanat. It was too easy for them to get away with faking it! They conspired and took advantage of all of the children protective laws viciously and recklessly. I have always been a champion of the protection of children!

Unfortunately there are attorneys that will take advantage of an "upper hand." to make a "quick buck!"

The mastermind of the law suit fraud, who was fired from Dicello/Levitt is Frank F. AKA Franklin Amanat. Frank claims to be J.D., *cum laude*, of the Harvard Law School. Frank's education achievements can not been verified. Frank has proven to be an unreliable narrator.

I request the court to have a verification system where an alleged Jane Doe would be required under seal to provide her drivers license to verify her age and country of origin. The court would be the only one that views this drivers license to protect the alleged victim. This can prevent future fraud of people making civil complaints that don't exist as human beings.

This should be part of the process when an individual accusing someone of crimes against humanity in a law suit with no follow up criminal complaint. In addition, my adversaries never made a criminal complaint against me. They were fully aware that a criminal complaint requires "hard evidence" and not a fraudulent affidavit.

Dicello/Levitt/Amanat will attempt to oppose this motion to "redact" out of spite alone!

They made this lawsuit personal, which conflicts with their oaths as attorneys.

They will not oppose this motion out of logic, civil law or ethics.

Please do not let them get a way with it again. They treated the lawsuit like a game. They forgot that there was a human being on the other side of their accusations named Jonathan Baram, that has a family, a life, a career and has dreams.

To them my life was just a chess match game. Their lack of empathy is incomprehensible and inhuman.


I apologize for not presenting "memorandas" to support my claims but I'm not aware how to locate them. Even if I located them, I'm not able to comprehend them due to my lack of education. My evidence is compelling and self-explanatory.

Your honor, I was born ready to fight for my life and go to trial and deposition for this matter. I never met Nygard in the physical form on American soil, so it will be completely impossible for my adversaries to prove otherwise. As I stated on the record I met Nygard only a few times in the Bahamas only, collectively for 10 minutes for a Maxim magazine shoot. My adversaries falsely claim the alleged crime that Nygard and I allegedly committed was in Manhattan, New York. That's preposterous.

These are crimes against humanity that I am accused of and are very serious but "laying them on my doorstep" is completely ridiculous.

Thank you for your time and consideration

Sworn before this 25th day of March 2025


Jonathan Baram

Notarized 

